

My Selfie

Privacy Policy

Summary

This privacy policy is operated by the Education department at the City and County of Swansea, and relates specifically to the My Selfie website and web application.

You may contact us with regard to this privacy policy, via:

- education@swansea.gov.uk

In summary, depending on your relationship with us, we will use your personal information:

- As needed to authenticate your access to the web application and transfer your pupil responses to the relevant school's management information system ("MIS").
- To provide personalisation features to the My Selfie website and web application, such as colour, textual style, and Welsh/English language preference.
- To manage and improve My Selfie and to comply with the law.

This privacy policy, which covers all of your personal information whether collected online or offline, including by telephone or where you write to us, provides detail on those activities and explains your rights and how to exercise them.

This privacy policy shall be construed in accordance with the law in England and Wales as applied in Wales. Any changes we make to our privacy policy in the future will be posted on this page.

By using this website you confirm that you accept the terms of this privacy policy and that you agree to comply with them.

Our Commitments to You

The City and County of Swansea is committed to protecting and respecting your privacy on the My Selfie website.

Although we will do our utmost to protect your information, we cannot guarantee the security or reliability of third party services. Your use of the internet and transmission of personal data is done so at your own

risk. Once we have received your information, we will use relevant security procedures to try to prevent unauthorised access. We will never pass on information about you unless we are legally obliged to do so under law in England and Wales as applied in Wales. We will never use any of your data in ways that might have unjustified adverse effects on you. We will never use information provided via My Selfie to make automated decisions that would affect you. My Selfie may contain links to third party charities and advice websites. If you follow a link to any external website, please note that they will have their own privacy policy and are not affiliated with My Selfie. It is your responsibility to check these policies before you submit any personal data to such websites. The City and County of Swansea will not display or make use of commercial advertising, behaviour targeting, fingerprinting, or tracking services on the My Selfie website.

Data Controller and Processor

This privacy policy sets out the basis on which any personal data we collect from you in the course of a browsing session, or that you provide to us during a browsing session may be processed by the City and County of Swansea and the affiliated schools that make use of My Selfie.

The City and County of Swansea will not collect any personally sensitive information about you unless you have chosen to give it to us. Therefore, the My Selfie website is structured so that you can visit it without identifying yourself or revealing any personally sensitive information.

The My Selfie website is structured in to two elements:

- The public website ("web site"); and
- the private Pupil Questionnaire and Staff Dashboard ("web application").

In relation to use of the public website – the My Selfie website; the City and County of Swansea will act as both the Data Controller and the Data Processor.

In relation to the private Pupil Questionnaire and Staff

Dashboard – the My Selfie web application; the City and County of Swansea will act as the Data Processor, and the affiliated school will act as the Data Controller.

Both affiliated schools and the City and County of Swansea will handle all your personal information in accordance with the Data Protection Act 1998 and the General Data Protection Regulation 2018 (GDPR).

Information We May Collect

The City and County of Swansea and affiliated schools will typically collect details provided by you as well as information relating to your

visits to My Selfie. We may collect and process the following data about you:

Information you give us. You may give us information about you by completing the pupil questionnaire on the My Selfie web application or by corresponding with us by phone, e-mail or otherwise. This information may include, and not be limited to, your name, e-mail address, organisation, phone number, questionnaire responses, UPN, class, and school.

Information we collect about you. With regards to each of your visits to the My Selfie website, we may automatically collect technical information, including the IP address used to connect your computer to the internet and your log-in information.

We may process this information in order to:

- Securely share pupil questionnaire responses with their school, or
- improve our services and detect or prevent fraud or abuse of our website and web application; and
- facilitate your access to the web application and different parts of the website.

We may also process this information in order to:

- Respond to a legal enquiry, or
- to keep a record of our correspondence with you.

This personal information may also be used to communicate with you if we have a legal obligation to do so, or you have consented. This personal information will not be used for the purposes of marketing or advertising.

This personal information may also be used to ensure that content from the website is presented in the most effective manner for you and for your computer, and/or to notify you about important changes to our web application.

In such instances, the City and County of Swansea will always give you the opportunity to opt out of consent based communications.

Any personal information collected will be treated as confidential and, save as set out in this privacy policy, the City and County of Swansea will not disclose any of your personal information except with your specific permission.

Pupil Responses to the Questionnaire

The City and County of Swansea will not actively monitor, make publically available, or sell the pupil responses to pupil questionnaires undertaken through the My Selfie web application.

The City and County of Swansea will not knowingly retain pupil personal information or pupil responses to pupil questionnaires within the My Selfie web application beyond the time period required to support the authorised transfer of the information to the schools'

Management Information System (“MIS”), as authorised by the parent, guardian, or other legal representative of the pupil.

Schools making use of My Selfie will support access to and correction of pupil personally identifiable information by the pupil or their authorised parent, guardian, or other legal representative.

Both the City and County of Swansea and schools making use of My Selfie will take reasonable steps to protect the security, privacy, confidentiality, and integrity of pupil personal information against risks – such as unauthorised access or use, or unintended or inappropriate disclosure – through the use of administrative, technological, and physical safeguards appropriate to the sensitivity of the information.

Data Security

Keeping your information secure is important to us and we take great care to limit what we collect through My Selfie and how we use it.

The City and County of Swansea has tried to create a secure and reliable web application. The City and County of Swansea has put in place appropriate organisational and technical safeguards and security measures given the nature of the information.

You should note however that e-mail enquiries may be transmitted by insecure means and stored off-line. You should recognise that the use of the internet and My Selfie is entirely at your own risk. The City and County of Swansea accepts no responsibility or liability for the security of personal information transmitted via the internet.

We are based in Swansea, Wales, in the United Kingdom. We will not transfer your personal information outside of the European Economic Area.

We keep your personal information only for as long as we need it for the purpose for which it was collected, plus a short additional period of time in case of any problems.

Pupil responses to questionnaires will not be stored within the My Selfie web application or on the My Selfie web server beyond the length of time required to transfer them to the relevant school, up to a maximum of 12 months from the date the responses were given.

Accounts and passwords are not stored on the My Selfie web application or on the My Selfie web server beyond the length of time required to authenticate and manage your logged in session.

Disclosure to Third Parties

The City and County of Swansea will not share pupil responses to pupil questionnaires with any third party. Any such request should be made to the school holding the data.

Schools acting as the Data Controller for pupil responses to pupil questionnaires will only disclose such information to appropriate bodies and authorities in good faith where required to do so by law.

This could include teams within the education department (e.g. psychologists), social services, health authorities, and the police.

Unless required to do so under a legal obligation, schools will seek consent from the pupil or their parent, guardian, or other legal representative, prior to disclosure.

The City and County of Swansea will only share data related to browsing sessions (see IP Addresses and Cookies) in order to:

- Comply with legal obligations, or
- enforce or apply our terms and conditions and other agreements, or
- protect the rights, property, or safety of the City and County of Swansea, or
- protect the rights, property, or safety of its employees, or others, or
- investigate or prevent a crime, or
- obtain professional legal advice, or
- with your consent.

Personal information obtained from My Selfie will not be shared by the City and County of Swansea or affiliated schools with:

- Third party advertisers, or
- social media providers, or
- analytics companies.

Schools may from time to time release anonymised statistics based on pupil responses to the pupil questionnaire, however such data will be anonymised in such a way as to avoid identifying an individual pupil. For example, "98% of our children think that their teacher is great!"

IP Addresses and Cookies

We may need to collect information about your IP address when visiting the My Selfie website, in order to ensure the security of the web application. We may analyse anonymised details of visits to our website, including but not limited to, peak time usage patterns, and popularity of content.

We will not share analytics data with third party web services.

Most websites use cookies to make the browsing experience more efficient, and to help you use websites to their full potential. Cookies are a small text file that is transferred to your hard drive or the internal memory of your mobile device. You can clear cookies in your browser settings.

Like most websites, My Selfie makes use of cookies.

When you visit our website, we use only strictly necessary cookies to enable navigation around our website, personalisation choices, and maintaining your log-in details for the duration of your authenticated session.

We do not use any third party or tracking cookies.

You may refuse to accept cookies by activating the relevant setting on your web browser; however, if you refuse cookies you may be unable to access certain parts of the website, e.g. the pupil questionnaire, and you may not be able to make personalisation choices.

Unless you have adjusted your browser setting so that it will refuse cookies, they will be used automatically by your browser where necessary.

If you want to learn more about cookies or if you want to know how to delete or control the cookies that are stored on your computer, you can visit:

- AboutCookies.org
- CookieCentral.com

How We Use Cookies

My Selfie uses cookies for two purposes:

- To help you personalise your experience with the My Selfie website.
- To assist with authentication and session management; for security.

Personalisation cookies allow you to decide between different colour schemes and font styles for our website, to assist with colour vision impairments and other eyesight issues, as well as personal taste. Information in regards to this personalisation is not stored or monitored by us and only takes place within your web browser. We would never use information derived from personalisation cookies to try to identify any individual, and will not share the information with third parties.

Authentication and session management cookies help us to ensure that your data remains secure. They are only one part of a larger set of security measures that we utilise. We need to use these session cookies each time you log in to the Pupil Questionnaire, or the Staff Dashboard.

Access to Information

We believe that the following legal reasons permit the use of your personal data:

A. Where it is needed to provide you with My Selfie, such as:

- To manage authenticated sessions and log-in information.

B. Where it is in our legitimate interests to do so, such as:

- To test the performance of My Selfie and internal processes.
- To follow guidance and best practice of regulatory bodies.
- For management and audit of our web server and network operations.
- To keep records of communications between you and us.
- In order to perform our duties or comply with any legal obligations.

C. With your consent, such as.

- For you to make use of the Pupil Questionnaire and store pupil responses.
- For you to make use of the Staff Dashboard.

Under the Data Protection Act 1998 and General Data Protection Regulation 2018 (GDPR), you have certain rights in respect of the information that both the City and County of Swansea and the affiliated school hold about you.

The Information Commissioner's Office has useful information in respect of your rights over your personal data.

- <https://www.ico.org.uk/>

If you wish to exercise your rights, you should contact either the City and County of Swansea, or the affiliated school, depending upon the right and the data.

Young people over the age of 12 will normally be considered able to exercise rights on their own behalf.

- **1. Your right to withdraw consent.**

If you wish to withdraw consent in regards to using the Pupil Questionnaire and storing pupil responses, you should contact the school to which you originally gave consent.

- **2. Your right to access the information held about you.**

If you wish to access pupil responses held in relation to you, you should contact the school to which you gave the responses.

If you wish to access information related to the IP address or authentication account that you accessed our system using, you should contact the City and County of Swansea.

In both cases, with some exceptions designed to protect the rights of others, you have the right to a copy of the personal data that is held about you, as well as information about what we do with it, who we share it with, and how long we will hold it for.

- **3. Your right to have inaccurate information about you rectified.**

You have the right to have information held about you corrected if it is factually inaccurate.

If you wish to rectify information held in relation to the pupil questionnaire, you should contact the school to which you originally gave the responses.

If you wish to rectify information held in relation to the authentication account that you sign in to our system using, you should contact the City and County of Swansea.

- **4. Your right to object to what we do with your data, and to have restrictions placed upon it.**

Where we process your personal data on the basis of our legitimate interest, you have the right to object to that processing and have restrictions placed upon it while we consider your objection.

- **5. Your right to have your information erased in some circumstances.**

You have the right to require us to delete the information that we hold about you if it is no longer necessary for the purpose we collected it for, and there is no other legal basis on which we must, or are allowed to, retain it.

- **6. Your right to complain to the Information Commissioner's Office.**

You have the right to lodge a complaint about our handling of your personal data with the supervisory authority, which in the United Kingdom is the Information Commissioner's Office. But before you do so, please contact us first to give us a chance to put matters right.

- education@swansea.gov.uk

You can contact the Information Commissioner's Office on [0303 123 1113](tel:03031231113).